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July 22, 2015

VIA EMAIL ForrestNYSDChambers@nysd.uscourts.gov  
and ECF

Honorable Katherine B. Forrest  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1950  
New York, New York 10007

Re: Matthew Belardinelli et al. v. Concepts in Staffing, Inc. et al.  
Case No. 1:15-cv-04935

Dear Honorable Forrest:

This office will be representing the Defendants in the above referenced matter. Yesterday, it came to our attention that a Summons and Complaint was served upon Defendant Concepts in Staffing through the New York State Secretary of State on July 6, 2015 but has not been served upon the individual Defendants. Additionally, we are in receipt of the Initial Case Management Conference Order scheduling a conference by telephone on July 28, 2015. The time for Defendants to serve and file an Answer has not yet come due. As such, we respectfully request an extension of time to file an Answer and Counterclaims. Additionally, we believe it would be more appropriate to adjourn the conference until after Defendants have had an opportunity to answer the Complaint.

I have contacted Plaintiff's counsel to request his consent for an extension of time to answer and to adjourn the conference but Plaintiff's counsel has not consented to our request. Accordingly, we respectfully request that Defendants time to answer the Complaint be extended until August 28, 2015 and that a conference be scheduled by the Court thereafter.

There have been no previous applications for the relief requested herein.

Very truly yours,

VOGEL & ASSOCIATES, P.C.

By: 

Bernard H. Vogel

Cc: Joel Klarreich, Esq.